

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

MATTHEWS INTERNATIONAL CORPORATION,	)	
	)	
	)	
Plaintiff,	)	No. 2:23-cv-00704-WSS
	)	
v.	)	<i>ELECTRONICALLY FILED</i>
	)	
RICHARD BELCOURT and TRIDENT RECYCLING AND REFINING LLC D/B/A TRIDENT RECYCLING, REFINING & REFRACTORY REPAIR, LLC,	)	
	)	
Defendants.	)	

**PLAINTIFF’S MOTION FOR EXPEDITED DISCOVERY**

Matthews International Corporation (“Matthews”), by and through its undersigned counsel, files the following Motion for Expedited Discovery pursuant to the Federal Rules of Civil Procedure, and in support thereof, states as follows:

1. By its Verified Complaint filed on April 27, 2023, Plaintiff seeks a temporary restraining order, preliminary injunction, permanent injunctive relief, and monetary damages against its former Supervisor Service – Western Region, Richard Belcourt (“Belcourt”), and Belcourt’s new competing company, Trident Recycling and Refining LLC d/b/a Trident Recycling, Refining & Refractory Repair, LLC (“Trident”) for violations of their statutory, contractual and/or common law obligations to Matthews.

2. Concurrently with this Motion, Plaintiff filed a Motion for Temporary Restraining Order and Preliminary Injunction, Motion to Preserve Documents and Things, and a Motion for an Expedited Hearing seeking to have the Court set a date for an evidentiary hearing on Plaintiff’s Motion for a Temporary Restraining Order and/or Preliminary Injunction.

3. To fully and adequately prepare for the preliminary injunction hearing, it is necessary that certain discovery, by way of depositions, production of documents, electronically stored information and things, and other written discovery, be scheduled and completed before the date of such hearing.

4. To complete this discovery before the Preliminary Injunction hearing, the time periods for discovery set forth in the Federal Rules of Civil Procedure must be shortened and expedited. For the convenience of the Court, copies of the following are attached hereto:

- Plaintiff's First Set of Interrogatories Directed to Richard Belcourt **(Exhibit A)**;
- Plaintiff's First Set of Interrogatories Directed to Trident Recycling and Refining LLC **(Exhibit B)**;
- Plaintiff's First Request for Production of Documents Directed to Richard Belcourt **(Exhibit C)**;
- Plaintiff's First Request for Production of Documents Directed to Trident Recycling and Refining LLC **(Exhibit D)**;
- Notice of Videotaped Deposition Directed to Richard Belcourt **(Exhibit E)**; and
- Notice of Videotaped Deposition Directed to Corporate Designee of Trident Recycling and Refining LLC pursuant to Fed. R. Civ. P. 30(b)(6) **(Exhibit F)**.

5. The information sought by Matthews is reasonable in scope, is not in Matthews' possession, and cannot be ascertained without discovery.

6. The imminence and severity of irreparable harm to Matthews and the interests of justice require that the time periods for discovery be shortened and expedited by this Court.

WHEREFORE, Matthews requests this Court to enter an Order in the form attached hereto expediting discovery in this matter.

Dated: April 28, 2023

Respectfully submitted,

/s/ Erin J. McLaughlin

Erin J. McLaughlin (PA 202044)

[erin.mclaughlin@bipc.com](mailto:erin.mclaughlin@bipc.com)

Jaime S. Tuite (PA 87566)

[jaime.tuite@bipc.com](mailto:jaime.tuite@bipc.com)

Nicholas J. Bell (PA 307782)

[nicholas.bell@bipc.com](mailto:nicholas.bell@bipc.com)

BUCHANAN INGERSOLL & ROONEY PC

Union Trust Building, Suite 200

501 Grant Street

Pittsburgh, PA 15219

Phone: 412-562-8800

Fax: 412-562-1041

*Attorneys for Plaintiff*